FILED
BRYAN MUNICIPAL COURT
Dec 2, 2025 - 08:54:16 AM

IN THE BRYAN MUNICIPAL COURT
IN AND FOR WILLIAMS COUNTY, OHIO

State of Ohio,
Plaintiff,

v.

Jeremy Lee Shepherd,
Defendant.

Case No.: CRB2400102
Judge: Hon. Ken L. North

# SUPPLEMENT TO MOTION TO DISMISS PROBATION VIOLATION REPORT

# AND DUE PROCESS OBJECTION TO SEALED FILING

COMES NOW Defendant, Jeremy Lee Shepherd, Pro Se, and respectfully submits this brief supplement to clarify a critical procedural issue that has come to light since the original motion was filed.

On the Court's docket, the entry dated November 25, 2025, for the "Initial Violation Report Filed by Probation" is clearly marked with a sealed icon (●), consistent with the Court's own docket legend. As of this filing, the Defendant has not been provided with a copy of that report and has no knowledge of the specific allegations or statements it contains.

## IX. SEALED REPORT BLOCKS DUE PROCESS

The sealed nature of the Violation Report prevents the Defendant from:

Reviewing the grounds for the alleged violation;

Confronting the basis for potential punishment;

Asserting a meaningful defense or clarification.

This violates the Defendant's rights under:

The Fourteenth Amendment to the U.S. Constitution;

Article I, Section 16 of the Ohio Constitution;

Ohio Criminal Rule 32.3(A) (requiring notice and hearing before revocation);

Gagnon v. Scarpelli, 411 U.S. 778 (1973) (due process requires disclosure of alleged violation and opportunity to respond).

The Court cannot act upon or schedule hearings based on secret evidence not disclosed to the accused. If redactions are necessary for third-party privacy, the State must seek a protective order. No such motion exists in this case.

## X. SELECTIVE SEALING REVEALS RETALIATORY PATTERN

In contrast, the Defendant's ADA-related motion—containing sensitive and federally protected medical information—was posted publicly on the Court's docket without redaction or sealing.

This inconsistent handling of sensitive materials appears retaliatory. The Court cannot publicly disclose the Defendant's private health data while simultaneously shielding a government accusation from review. This imbalance violates both due process and the ADA's anti-retaliation provision (42 U.S.C. § 12203).

## XI. PRAYER FOR RELIEF

WHEREFORE, the Defendant respectfully requests that this Honorable Court:

1. Dismiss the probation violation report filed under seal on November 25, 2025, for failure to provide due process;

2. Alternatively, order the immediate disclosure of the sealed Violation Report to the Defendant;

3. Bar any enforcement or sanction based on the sealed report unless and until it is unsealed and served;

4. Stay all further probation proceedings related to the violation report pending disclosure and hearing;

5. Grant such other and further relief as is just and proper.

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd, Pro Se
Email: jeremyshepherd07@outlook.com
Dated: December 1, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Supplement was served via email this 1st day of December, 2025, upon the following:

City Prosecutor James Duranczyk
Email: pnickolite@cityofbryan.com

Probation Officer Kelly Tietje
Email: ktietje@cityofbryan.com

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd